

EXHIBIT C

DECLARATION OF CHARLES KIM

1. My name is Charles Kim. I am more than twenty-one years of age, and I am competent to testify. I am the Secretary and an employee of Kyungshin-Lear Sales and Engineering, LLC ("KL Sales"). This Declaration is based upon my knowledge following reasonable inquiry. As used herein, the word "Jurisdictions" means **Arkansas, California, the District of Columbia, Louisiana, Minnesota, Mississippi, Puerto Rico, and West Virginia.**

2. KL Sales is a Delaware limited liability company with its principal place of business in Alabama.

3. KL Sales does not engage in manufacturing activities, directly or through others in the Jurisdictions.

4. Based upon reasonable inquiry, since January 1, 2000, KL Sales has not had any direct sales of manufacturing products into the Jurisdictions.

5. Based upon reasonable inquiry, since January 1, 2000, KL Sales has not had any parent or subsidiary whose principal place of business is in the Jurisdictions.

6. Based upon reasonable inquiry, since January 1, 2000:


- (a) KL Sales has not been licensed to do business in the Jurisdictions;
- (b) KL Sales has not had its principal place of business in the Jurisdictions;
- (c) KL Sales has not been incorporated in the Jurisdictions;
- (d) KL Sales has not had offices in the Jurisdictions;
- (e) KL Sales has not owned or leased real estate in the Jurisdictions;
- (f) KL Sales has not employed individuals or agents who work in the Jurisdictions;
- (g) KL Sales has not been sued in the Jurisdictions before this case;
- (h) KL Sales has not conducted manufacturing in the Jurisdictions;

- (i) KL Sales has not paid taxes in the Jurisdictions;
- (j) KL Sales has not maintained bank accounts in the Jurisdictions;
- (k) KL Sales has not conducted directors' or officers' meetings in the Jurisdictions;
- (l) KL Sales's officers and directors do not work in the Jurisdictions; and
- (m) KL Sales has not maintained an address or telephone or fax number in the

Jurisdictions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 11, 2012


Charles Kim